

RE: Important: PCBs Exterior of 100 California Street Building  
Marc Gille  
to:  
Carmen Santos  
09/28/2010 12:23 PM  
Cc:  
Arlene Kabei  
Show Details

History: This message has been replied to.

Carmen,  
Sorry for the delay, but wanted to confirm the responses with our Hygienist who prepared the report.  
Please see the responses below.  
This should wrap-up any outstanding issues and look forward to receiving approval shortly.  
Thank you.

Marc Gille  
Broadway Partners  
100 California Street, Ste 610  
San Francisco, CA 94111  
Main: (415) 781-5100  
Fax (415) 520-6658

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**From:** Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]  
**Sent:** Monday, September 13, 2010 2:36 PM  
**To:** Marc Gille  
**Subject:** Important: PCBs Exterior of 100 California Street Building  
**Importance:** High

Hello Mark:

The Notification submitted for PCB cleanup at the 100 California Street Building does not include the cleanup levels to be achieved on the First Floor and Second Floor and above.

*[Marc Gille] The building finishes are polished granite and the marble chip testing, which you requested, indicated that over the previous 50 years, stone surfaces have absorbed relatively small amounts of PCBs from caulking. Residual PCBs within building finishes were measured at < 0.79 ppm at ground level. Exterior granite finishes on upper floors (> 25') have residual PCB concentrations of 7.32 ppm. As these areas are low occupancy they should also meet the current cleanup up levels for low occupancy area.*

*These results are consistent with the guidance given in CFR 761.62 and there is no scientific or professional reasoning to deviate from those regulatory limits for this project, especially in light of the pilot study.*

These surface PCB cleanup levels must be expressed as ug/100 square centimeters; and not as mg/kg based on analysis of chip samples from decorative stones conducted during the 2009 pilot study. *[Marc Gille] This is in conformance with our current plan. Please see Section 6.0 "Cleanup Verification"*

After the PCB caulk is removed, grinding will be conducted on surfaces in contact with caulk followed by cleaning with alcohol. Surface wipe samples will be collected after cleaning surfaces with alcohol. The results of those surface wipe samples will be compared to the cleanup levels to determine if the PCB cleanup met those levels. *[Marc Gille] This is in conformance with our current plan. Please see Section 6.0 "Cleanup Verification"*

Therefore, USEPA will add the surface cleanup level in the conditions of approval and if you have questions or want to discuss those cleanup levels further, we can do that.

The letter transmitting the Notification includes estimated residual PCB concentrations in the decorative stone based on the results of the 2009 pilot study. I am glad that information was included. However, those residual PCB concentrations are not the cleanup levels that will be used to compare the results of standard surface wipe samples to be collected for PCB cleanup verification. *[Marc Gille] This is in conformance with our current plan. Please see Section 6.0 "Cleanup Verification"*

Please call me if you have any questions concerning this message.

Thank you for your courtesies.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
415.972.3360  
fax: 415.947.3533